

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>KEENAN AND KIM KENNEDY</b>	:	
<b>P/N/G of TIREKE NEWSOME, a minor</b>	:	
	:	<b>CIVIL ACTION</b>
<b>Plaintiffs</b>	:	
	:	
<b>v.</b>	:	<b>No: 1:11-CV-0382-JEJ</b>
	:	
<b>CITY OF LEBANON, et al.</b>	:	
	:	
<b>Defendants</b>	:	

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**REPLY BRIEF IN FURTHER SUPPORT OF MOTION TO DISMISS  
PLAINTIFF'S AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P.  
12(b)(6) OF DEFENDANTS, GOOD SAMARITAN HEALTH SERVICES  
FOUNDATION AND GOOD SAMARITAN FAMILY PRACTICE**

In further support of their Motion to Dismiss Plaintiff's Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), as filed of record on June 29, 2011 (Doc. 53), Defendants Good Samaritan Health Services Foundation and Good Samaritan Family Practice agree with and hereby adopt relevant and equally applicable arguments set forth in the Reply Brief of Co-Defendants, Maryanne T. Bartley, the School District of Lebanon and Neil Young as filed of record on August 26, 2011 (Doc. 59).

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**

/S/

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By: Craig A. Stone, Esquire  
Michael C. Mongiello, Esquire  
4200 Crums Mill Road, Suite B  
Harrisburg, PA 17112  
(717) 651-3500

Dated: September 1, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Dismiss has been served upon the following known counsel and parties of record this 1<sup>st</sup> day of September, 2011, via electronic filing:

Matthew B. Weisberg, Esquire  
Weisberg Law, P.C.  
7 South Morton Avenue  
Morton, PA 19070

John E. Freund, III, Esquire  
King, Spry, Herman, Freund &  
Faul  
One West Broad Street  
Suite 700  
Bethlehem, PA 18018

David J. MacMain, Esquire  
Lamb McErlane, P.C.  
24 East Market Street  
PO Box 565  
West Chester, PA 19381-0565

/S/

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Michael C. Mongiello